tions to the law, held that its effect was violative of the Constitution, in that it disfranchised voters who through no fault of their own, but because the law offered them no opportunity, were unable to register.

Power to Regulate Advertising.—New York City passed an ordinance regulating the use of streets for the exhibits of advertising, providing that no advertising wagons be allowed therein except ordinary business notices on wagons not used merely for advertising. The power to pass this ordinance was questioned in Fifth Ave. Coach Company *v.* City of New York, 86 Northeastern Reporter, 824. It appeared that the compensation which the Coach Company derived by advertising was regulated by the number of coaches which it employed. This number constantly increased. By the advertising display alone was realized a gross income of more than 6 per cent. on the entire capital stock. Slow moving trucks were barred from the streets owing to the congestion attending the passing of these garish vehicles. The New York Court of Appeals decided the ordinance within the city's power to pass, remarking that every procession, parade, or show upon vehicles passing through the public streets tends to congestion therein, and to some extent interferes with those engaged in business. If the company have the right to so decorate its conveyances, the owner of any wagon would have the same right, such a panorama of urban art being capable of assuming the aspect of a congestive menace.

Obstructing Sidewalks by Fruit Merchants.—Its sidewalks being occupied by shiners of shoes and venders of fruit, a city passed an ordinance making it unlawful for any person to erect any booth, shed, stand, or any other obstruction upon the sidewalk for the sale of merchandise, or to be used for shining shoes. By those newly acquired citizens whom this regulation affected, it was bitterly assailed in Chapman *v.* City of Lincoln, 121 Northwestern Reporter, 596. Plaintiffs complained that other merchants were allowed to use the sidewalks for the display of their goods. The Nebraska Supreme Court held the city without authority to bind the public whose free right to the streets and sidewalks could not be taken. Because it, perhaps illegally, has seen fit to allow its merchants to display upon the walls in front of their stores samples of their wares, it does not follow that it was ever the intention of the city to allow such merchants to convert the sidewalk space set apart for the public into a source of revenue by subletting to obnoxious persons who use it for crying out, engaging their services, and selling their wares.

Denial of Equal Protection of Convicts.—Prisoners in Idaho, attempting an escape, were punishable by confinement for the term of their original sentence. If a convict were serving a one-year

sentence, his punishment for escape would be one year, while a convict serving a twenty-year sentence would be punished for exactly the same offense by being imprisoned just twenty times as long. The method of determining the punishment for one confined for life, attempting to escape, is not made clear. This statute was alleged to deny equal protection to all persons charged with its violation and to be unreasonable and class legislation. To say that the long-time convict is more culpable for precisely the same behavior, is absurd. The punishment for such escape would be not upon the act of escaping a prison, but upon the act of escaping a punishment fixed by the judgment of conviction. The statute, however, makes the escape from the state prison the offense, and not the escape from the punishment of the judgment fixed by the court upon trial. In Ex parte Mallon, 102 Pacific Reporter, 374, the Idaho Supreme Court held this statute unconstitutional.

Prohibiting Seining in Vicinity of Docks.—The town of Santa Monica passed an ordinance prohibiting seining within 1,000 feet of its docks. In Ex parte Bailey, 101 Pacific Reporter, 441, the California Supreme Court thought it manifest from the terms of the ordinance that it was in no sense designed for the preservation and protection of fish for the benefit of the state. It was clearly the sole object of the ordinance to protect and add to the piscatorial advantages of the wharves, docks, and piers in the town, and to increase the fortune of the wielders of hook and line. This being the purpose of the ordinance, it was clearly beyond the power of the town to enact.

Soliciting Business by Attorney.—In Washington an attorney is prohibited from soliciting employment either directly or indirectly. A breach of these restrictions is termed barratry, for which the offender may be disbarred. Appellant in State *v.* Rossman, 101 Pacific Reporter, 357, had been charged with slander, perjury, fraud upon those employed to solicit business, and barratry. He contended that the right to practice law was a natural right guaranteed by the Constitution, and the barratry statute deprived him of his right to liberty and the pursuit of happiness in that he was forbidden to use his faculties as he chose in his vocation. The Washington Supreme Court thought the disbarment proper, remarking that the practice of law is not a constitutional right, but one granted by the state, which may surround it with reasonable restrictions.

Power of Courts to Punish for Contempt.—A Missouri statute prohibits courts from punishing contempts by fine exceeding $50 or imprisonment for more than 10 days. In Chicago, B. & Q. Ry. Co. *v.* Gildersleeve, 118 Southwestern Reporter, 86, it appeared that appellant had disregarded an injunction forbidding his traffic in partly used